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May 25, 2018

Hon. Christian F. Hummel (via ECF)
United States Magistrate Judge
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: *National Rifle Association of America v. Cuomo et al*
Northern District of New York
18-CV-0566 (LEK)(CFH)

Dear Judge Hummel:

This office, by the undersigned, represents Governor Andrew M. Cuomo, the New York State Department of Financial Services ("DFS") and DFS Superintendent Maria T. Vullo in the above-referenced action. Currently, responses to the complaint are due by June 4, 2018.

In light of scheduling considerations, and the significant issues involved in this case, I requested from plaintiff's counsel an agreement extending defendants' time to respond to the complaint to August 1, 2018. Counsel declined to agree and, instead, offered to extend defendants' time to respond to the complaint by thirty days with the caveat that defendants agree to plaintiffs conducting pre-answer discovery. During this conversation, I stated that defendants would be willing to shorten the length of the extension if the deadline could be July 11, 2018.

I thereafter informed counsel that defendants will not consent to any pre-answer discovery, and counsel advised that plaintiff will not consent to any unencumbered extension of defendants' time to respond to the complaint.

Accordingly, on behalf of the defendants, I respectfully request permission from the court extending defendants' time to respond to the complaint to **July 11, 2018**.

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Thank you for your consideration of this matter.

Respectfully yours,

s/ Adrienne J. Kerwin

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